

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AARON MANOPLA and EVELYN
MANOPLA, on behalf of themselves and all
other similarly situated

Plaintiffs,

v.

HOME DEPOT USA, INC., ATLANTIC
WATER PRODUCTS and JOHN
DOES 1-25,

Defendants.

Civil Action No. 3:15-cv-01120-PGS-TJB

**UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF CLASS
ACTION SETTLEMENT**

Representative Plaintiffs, Aaron Manopla and Evelyn Manopla (the “Representative Plaintiffs”), having reached an agreement in principle with Defendant, Home Depot U.S.A., Inc. d/b/a/ The Home Depot (“Home Depot”) and Defendant Atlantic Water Products, Inc. d/b/a Atlantic Water and Air (“AWP”)(collectively “Defendants” and, together with Representative Plaintiff, the “Parties”) to settle the above captioned case, respectfully move this Court to enter the proposed Order Preliminarily Approving Proposed Settlement, Approving Class Notice, and Scheduling Settlement Hearing (the “Preliminary Approval Order”).

In support of this unopposed motion, Representative Plaintiffs submit the enclosed memorandum of law, declarations of counsel along with their Settlement Agreement with Defendants.

Respectfully submitted this 23rd day of May 2019.

s/ Ross H. Schmierer

Ross H. Schmierer, Esq.

DeNITTIS OSEFCHEN PRINCE, P.C.

525 Route 73 North, Suite 410

Marlton, New Jersey 08053
Telephone: (856) 797-9978
Facsimile: (856) 797-9951
Email: rschmierer@denittislaw.com

Ari H. Marcus, Esq.
MARCUS & ZELMAN, LLC
1500 Allaire Avenue, Suite 101
Ocean, New Jersey 07712
Telephone: (732) 695-3282
Facsimile: (732) 298-6256
Email: Ari@MarcusZelman.com

Todd M. Friedman, Esq.
LAW OFFICES OF TODD M. FRIEDMAN
2155 Oxnard Street #780
Woodland Hills, CA 91367
Telephone: (877) 206-4741
Facsimile: (866) 633-0228
Email: TFriedman@toddfllaw.com

Attorneys for Plaintiffs
Aaron Manopla and Evelyn Manopla, Individually and
on Behalf of All Others Similarly Situated